

# EXHIBIT G

**McQueen, Allison L.**

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**From:** Gabrielle Vinci <GVinci@nmllplaw.com>  
**Sent:** Tuesday, June 18, 2024 4:23 AM  
**To:** Matthews, Jordan M.  
**Cc:** Biesenthal, Bethany K.; McQueen, Allison L.; Kara Gorycki  
**Subject:** Re: Returning call

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If you are concerned about the message's content, highlight the email in your inbox and click "Report Suspicious" in the Outlook ribbon -or- contact 6Help.

Good morning, all. I have unexpectedly gone on maternity leave early. Kara will be taking back over this case. Please confer with her moving forward regarding discovery. Thank you.



**Gabrielle Vinci, Partner**

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On Jun 17, 2024, at 6:29 PM, Matthews, Jordan M. <jmatthews@jonesday.com> wrote:

Gabrielle,

Thank you for the update. To ensure there is no confusion, the outstanding issues laid out in our previous emails are copied below. We will be prepared to file a motion to compel if all of these issues are not remedied by 5:00 p.m. ET on Wednesday, June 19.

Best,  
Jordan

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Plaintiff's Interrogatory Responses

1. In the Second Amended Interrogatory Responses we received on Tuesday, May 21, Plaintiff failed to confirm that she is not withholding any information on the basis of her objections or a claim of privilege in her response to Interrogatory No. 8.
2. In response to Interrogatory No. 8, Plaintiff lumped Elizabeth Pardoe in with her description of information she shared with former members of the Spirit Squad. Ms. Pardoe is a Northwestern University professor. Please provide a separate description of the information Plaintiff provided to Ms. Pardoe regarding "any alleged inappropriate touching, exploitation, or verbal harassment that Plaintiff experienced while a member of the Spirit Squad."

Plaintiff's RFP Responses and Document Productions

1. As explained in our previous emails, it appears that a significant number of screenshots were included in your May 21 production (to identify just a few, PLTF000888 and PLTF000898–000910). We are also missing various emails in each chain and the attachments to emails. In fact, when we uploaded Plaintiff's production to Relativity, there was not a single document in the production that was part of a family. Please provide a written description of the process you used for the collection of Plaintiff's ESI (including how the documents were collected and how search terms were applied, if at all). Plaintiff needs to collect—and produce—native files rather than cherry-picking portions of email conversations for production.
2. In the unanswered email we sent on May 24, we explained that we would have no choice but to file a motion to compel if we had not received a substantial portion of Plaintiff's production by May 31 (seven months after Polisky's Requests for Production were served). Since that date, we received a small production on June 5 (PLTF001587–001703), which was largely made up of corrupted files. PLTF001587–001682 are illegible and need to be reproduced.
3. In addition to producing a substantial portion of Plaintiff's outstanding production by Wednesday at 5:00 p.m. ET, please provide firm dates when we can expect the following:
  1. Plaintiff's next rolling ESI production;
  2. The last date by which all of Plaintiff's ESI will be produced;
  3. Hard copy documents that are responsive to Polisky's requests for production, particularly Request Nos. 4–5, 8, 13–15, 17–18, 22, 25, 29–32, 35–41, 43–47, and 49;
  4. Written confirmation that Plaintiff is not withholding any documents based on her objections and claims of privilege; and
  5. Amended responses to Polisky's requests for production confirming that all responsive documents have been produced or, alternatively, that there are no documents responsive to a particular request.

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**From:** Gabrielle Vinci <GVinci@nmllplaw.com>  
**Sent:** Monday, June 17, 2024 4:57 PM  
**To:** Matthews, Jordan M. <jmatthews@jonesday.com>  
**Cc:** Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; McQueen, Allison L. <amcqueen@jonesday.com>  
**Subject:** RE: Returning call

Hi Jordan,  
Yes, these will all be addressed before Wednesday. Thank you.



**Gabrielle Vinci, Partner**

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**From:** Matthews, Jordan M. <jmatthews@jonesday.com>  
**Sent:** Monday, June 17, 2024 5:52 PM  
**To:** Gabrielle Vinci <GVinci@nmllplaw.com>  
**Cc:** Biesenthal, Bethany K. <bbiesenthal@jonesday.com>; McQueen, Allison L. <amcqueen@jonesday.com>  
**Subject:** RE: Returning call

Gabrielle –

I was following up on the attached communications from May 24 and June 7, to which we received no response. I was reaching out in a final attempt to resolve these issues before filing a motion to compel. Will plaintiff be able to address these issues before Wednesday? Given that we have been waiting over three weeks for a response, I don't feel comfortable holding off on this motion any further.

Best,  
Jordan

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**From:** Gabrielle Vinci <[GVinci@nmllplaw.com](mailto:GVinci@nmllplaw.com)>  
**Sent:** Monday, June 17, 2024 4:40 PM  
**To:** Matthews, Jordan M. <[jmatthews@jonesday.com](mailto:jmatthews@jonesday.com)>  
**Subject:** Returning call

Hi Jordan,

My paralegal advised you called the office looking for me. I am working remotely until my leave begins next week. Please let me know if you are available for a call on Wednesday. Thanks.



**Gabrielle Vinci, Partner**

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